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June 13, 2012

BY HAND/ECF

Honorable Steven M. Gold
United States Chief Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 13D
Brooklyn, New York 11201

Re: Rodriguez v. St. Vincent's
Services, et al
Civil Docket No.: 10-CV-4661

Patrick Alford v. The City of
New York, et al
Civil Docket No.: 11-CV-1583
10-CV-04661

P.A., Jr. v. City of New York; et al
Civil Docket No.: 10-CV-04661

Our File No.: 06100-16617

Dear Magistrate Gold:

Pursuant to your Order, a deposition schedule for the party witnesses was submitted (see document number 211) on June 6, 2012 and approved by Order dated June 8, 2012.

Pursuant to the schedule, Dr. Eugene Plotnick was to be produced on behalf of St. Vincent's for examination before trial on June 14, 2012.

Yesterday afternoon we received notification that Dr. Plotnick is suffering a number of conditions which prevent

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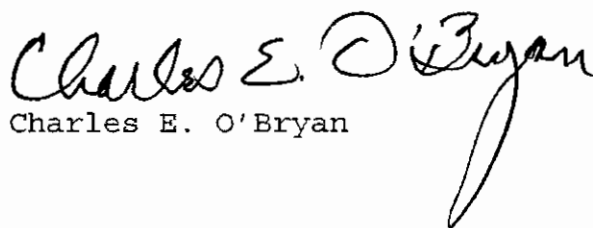
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his being able to attend the previously scheduled and Court-ordered deposition. He is currently being treated for gastritis as well as an injury to his back.

We have advised all counsel of the above and will work with them to reschedule Dr. Plotnick's examination before trial. We will be in a better position to assess how soon this can be accomplished upon receiving further confirmation of the duration of Dr. Plotnick's disabilities and consultation with counsel.

Therefore, we are respectfully requesting that, given the nature of Dr. Plotnick's inability to attend the previously scheduled deposition, we be allowed to reschedule his examination before trial.

Respectfully submitted,


Charles E. O'Bryan

CEO:dml

cc: VIA HAND/ECF
Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza, Room 727 S
Brooklyn, New York 11201

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